

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

PAULO ARANDA,

Plaintiff,

vs.

No. C06-04738 JW

NTH CONNECT TELECOM,
INC., et al.,

Defendants.

DEPOSITION OF DANIELLE SILVA
VOLUME III - Pages 118 - 180

Date: Thursday, October 25, 2007

Time: 9:43 a.m.

Location: DALBON & WANG
12 South First Street
Suite 613
San Jose, CA 95113

Reported by: Howard Schroeder, CSR
License Number 1123

#28818

1 to that name column is called "Production salary".
2 And next to it you called "deduction". And the
3 next column you said "Total".

4 THE WITNESS: OK.

5 Q BY MR. WANG: So that original documents that
6 you got from Steven Chen, do they have the same
7 columns, same layout for the portion that is --
8 that is designated for Paulo?

9 A I'm not sure what you're asking.

10 Q OK.

11 A You're asking if all this file have the same
12 all the way out?

13 Q Just -- just -- OK. Let's talk about that
14 Excel file you got from Steven Chen.

15 A OK.

16 Q OK. And the same Excel file except he has
17 some itemized sheets which you called tabs. What
18 do you organize by sheet? Is it by pay period
19 or -- I mean, every sheet represents what
20 information?

21 MR. CARLSON: Do you understand what
22 he's saying?

23 THE WITNESS: Yeah. There's one sheet
24 that says "payroll". There's a second sheet that
25 says "invoice", which is what we bill ComCast for.

1 There's a third sheet that says "invoice number
2 two" that's for two weeks. And then each
3 technician has its own sheet.

4 MR. CARLSON: That's for techs though.

5 THE WITNESS: For technicians.

6 MR. CARLSON: We don't need to answer
7 that for technicians. What would it be for
8 Aranda?

9 THE WITNESS: He had a tech number 8851.
10 That's his tech number. But because he was only
11 on salary, the only thing that mattered for him is
12 what was on the payroll, on the first tab.

13 Q BY MR. WANG: So you have payroll and you
14 have invoice. And the third sheet is what? The
15 third tab is what?

16 MR. CARLSON: Nothing for him.

17 MR. WANG: I just wanted to understand.
18 What was that.

19 THE WITNESS: It's invoice two.

20 Q BY MR. WANG: Invoice two is for what?

21 A For the second week of the pay period
22 invoiced to ComCast.

23 Q Oh, OK.

24 A And then after that, each technician has its
25 own tab.